

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

07 Cr. 736 (S-1) (CPS)

RICARDO FANCHINI,

**NOTICE OF MOTION**

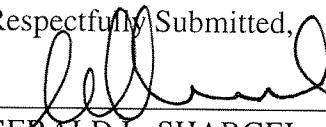
Defendant.

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PLEASE TAKE NOTICE THAT, upon the annexed affirmation of Henry E. Mazurek, Esq., dated the 9<sup>th</sup> day of June, 2008, the exhibits annexed thereto, and the memorandum of law submitted herewith, the defendant Ricardo Fanchini will move this Court before the Honorable Judge Charles P. Sifton, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY, on the 23rd day of June, 2008, or on such other date thereafter that is convenient to the Court, for an order:

- I. Allowing defense counsel equal access to foreign investigative files in the government's custody and control;
- II. Directing the government to produce translations of all discoverable foreign language documents in advance of the pretrial motions return date;
- III. Setting a date certain for the completion of discovery; and
- IV. Directing the temporary release of Mr. Fanchini to defense counsel's law offices under the custody of a private security agency paid for by Mr. Fanchini so that he may have a meaningful opportunity to prepare his defense.

Respectfully Submitted,

  
GERALD L. SHARGEL

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